

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"**
(Counts One through Six)
2. **JOSE RODRIGUEZ-MARRERO, a/k/a "Zurdo,"**
(Counts One, Four and Five)
3. **NICHOLAS PEÑA-GONZALEZ, a/k/a "Nicky,"**
(Count One, Two and Three)
4. **OMAR F. GENAO-SANCHEZ, a/k/a "Omi,"**
(Counts One, Two, and Three)
5. **HERIBERTO NIEVES-ALONZO, a/k/a "Jun,"**
(Counts One and Four)
6. **HENRY PAMIAS-BURGOS, a/k/a "Moncho Orejas,"**
(Counts One and Four)
7. **PATRICIO PEREZ-VEGA,**
(Counts One and Four)
8. **ENRIQUE ARIZMENDI VELEZ,**
(Count One)

SUPERSEDING

INDICTMENT

Criminal No. 97-284 (JAF)

Violations:

*Title 21, United States Code,
Sections 846 and 848(e)(1)
(conspiracy and attempt to
possess narcotics with the
intent to distribute and murder
during drug trafficking offense)*

Title 18, United States Code:

*Section 924(j) and (o)
(firearm killing in relation
to drug trafficking offense
and conspiracy)*

*Section 1512(a)
(killing of a government
witness or informant)*

*Section 1512(b)
(tampering with a witness)*

*Section 2
(aiding and abetting)*

98 JUL 15 1998
U.S. DISTRICT COURT
SAN JUAN, P.R.

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9. **RAUL SANTODOMINGO-ROMERO,**
(Count One)

10. **LUIS ANGEL LOPEZ-LORENZO,**
a/k/a "Millo,"
(Count Six)

Defendants.

(SIX COUNTS)

THE GRAND JURY CHARGES:

COUNT ONE

Title 21, U.S.C., Section 846

DRUG TRAFFICKING CONSPIRACY

Beginning on a date unknown, but no later than in or about 1993, and ending on a date unknown, but no later than in or about October, 1996, in the District of Puerto Rico and elsewhere and within the jurisdiction of the Court,

1. **VICTOR MANUEL VALLE LASSALLE,**
a/k/a "Manolo,"
2. **JOSE RODRIGUEZ MARRERO,**
a/k/a "Zurdo,"
3. **NICHOLAS PEÑA GONZALEZ,**
a/k/a "Nicky,"
4. **OMAR F. GENAO-SANCHEZ,**
a/k/a "Omi,"
5. **HERIBERTO NIEVES ALONZO,**
a/k/a "Jun,"
6. **HENRY PAMIAS-BURGOS,**
a/k/a "Moncho Orejas,"
7. **PATRICIO PEREZ-VEGA,**
8. **ENRIQUE ARIZMENDI-VELEZ,**
9. **RAUL SANTODOMINGO-ROMERO,**

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the defendants herein, did knowingly, willfully, unlawfully, and intentionally combine, conspire, confederate and agree with each other and divers other persons to the grand jury known and unknown, including Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo," (deceased), Edward Llaurador-Rodriguez (deceased), to commit offenses against the United States, to wit, to knowingly, intentionally, willfully, and unlawfully possess with the intent to distribute multi-kilogram quantities of cocaine, a Schedule II narcotic drug controlled substance, in excess of five (5) kilograms and multi-hundred pound quantities of marijuana, a Schedule I controlled substance, that is conspiracy to violate Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

A. OBJECTS OF THE CONSPIRACY

1. It was an object of the conspiracy to retrieve large shipments of cocaine and marijuana off the coast of Puerto Rico to be smuggled into Puerto Rico for distribution to other drug traffickers.
2. It was a further object of the conspiracy to generate and obtain significant monetary profits in the form of illegal drug proceeds from the retrieval and distribution of narcotics as described in paragraph 1, above.

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B. MANNER AND MEANS TO ACCOMPLISH THE CONSPIRACY

The manner and means by which the defendants and co-conspirators would further and accomplish the objects of the conspiracy included, among others, the following:

1. It was part of the conspiracy that the defendants and their co-conspirators would organize and/or assist in the smuggling of multi-kilogram quantities of cocaine and/or marijuana into Puerto Rico.
2. It was a further part of the conspiracy that the defendants and their co-conspirators would purchase and sell cocaine and marijuana.
3. It was a further part of the conspiracy that the defendants and their co-conspirators would have different roles and would perform different tasks in furtherance of the conspiracy.
4. It was a further part of the conspiracy that the defendants and their co-conspirators would possess and carry firearms for their personal protection and to protect narcotics and drug proceeds.
5. It was a further part of the conspiracy that the defendants and their co-conspirators would use violence, including murder, in order to maintain order within the organization and to retaliate against those who were viewed as having betrayed the drug trafficking organization.

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C. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

The defendants did commit, among others, in the District of Puerto Rico, the following overt acts in furtherance of the objects and aims of the conspiracy.

1. On various dates in or about 1993 and 1994, [9] **RAUL SANTODOMINGO-ROMERO**, with the assistance of [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a “Manolo,”** and others, organized the smuggling of multi-hundred kilogram quantity shipments of cocaine and marijuana into Puerto Rico.

2. In or about July of 1993, [9] **RAUL SANTODOMINGO-ROMERO** delivered, on two occasions, a total of approximately one hundred thousand dollars (\$100,000) in drug proceeds to an FBI agent (who was acting in an undercover capacity), so that they could be delivered to the sources of supply of narcotics in Colombia, South America.

3. In or about early June of 1996, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a “Manolo,”** supervised associates of his, including Carlos Roberto Rodriguez-Torres, a/k/a “Robert Caballo” (deceased), with respect to the importation of a multi-kilogram shipment of cocaine into Puerto Rico, a portion of which (approximately sixty-five (65) kilograms) was not accounted for and was believed to have been stolen from the owners.

4. In or about June of 1996, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a “Manolo,”** organized members of his organization in order to assist in the importation, off-loading

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and distribution of a shipment of approximately two thousand pounds (2,000 lbs.) of marijuana, which was to be brought into Puerto Rico's southern coast.

5. In or about June of 1996, [1] **VICTOR MANUEL VALLE-LASSALLE a/k/a "Manolo,"** [3] **NICHOLAS PEÑA-GONZALEZ, a/k/a "Nicky,"** [4] **OMAR F. GENAO-SANCHEZ, a/k/a "Omi,"** [5] **HERIBERTO NIEVES-ALONZO, a/k/a "Jun,"** [8] **ENRIQUE ARIZMENDI VELEZ,** Edward Llaurador Rodriguez (deceased), and others travelled to the southern coast of Puerto Rico in order to assist in the planned importation of marijuana.

6. In or about June of 1996, [1] **VICTOR MANUEL VALLE-LASSALLE a/k/a "Manolo,"** [4] **OMAR F. GENAO-SANCHEZ, a/k/a "Omi,"** travelled by boat to an area off the southern coast of Puerto Rico in order to pick up the marijuana shipment, though the pick-up was not accomplished due to logistical problems.

7. In or about July of 1996, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** ordered the murder of Carlos Roberto Rodriguez-Torres, a/k/a "Roberto Caballo," and recruited [3] **NICHOLAS PEÑA-GONZALEZ, a/k/a "Nicky,"** and [4] **OMAR F. GENAO SANCHEZ, a/k/a "Omi,"** to assist in that murder.

8. On or about July 15, 1996, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** [3] **NICHOLAS PEÑA-GONZALEZ, a/k/a "Nicky,"** and [4] **OMAR F. GENAO SANCHEZ, a/k/a "Omi,"** (while aiding and abetting each other) killed Carlos Roberto Rodriguez-Torres, a/k/a "Roberto Caballo."

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9. On or about October 13, 1996, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** recruited associates of his in order to kill Edward Llaurador-Rodriguez, who was cooperating with the police and was a witness against [1] **VALLE-LASSALLE**, [3] **PEÑA-GONZALEZ**, and [4] **GENAO-SANCHEZ** with respect to the murder of Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo."

10. On or about the evening of October 13, 1996, [6] **HENRY PAMIAS-BURGOS, a/k/a "Moncho Orejas,"** with the assistance of [7] **PATRICIO PEREZ-VEGA**, arranged for the delivery of Edward Llaurador-Rodriguez to [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** and others as part of the plan to kill Edward Llaurador-Rodriguez.

11. On or about the evening of October 13, 1996, [1] **VICTOR MANUEL VALLE-LASSALLE, a/k/a "Manolo,"** supervised the murder (by decapitation with a machete) of Edward Llaurador Rodriguez by [2] **JOSE RODRIGUEZ-MARRERO, a/k/a "Zurdo,"** who were assisted by Jose Hernandez-Jimenez, a/k/a "Chelo," (deceased), [5] **HERIBERTO NIEVES-ALONZO, a/k/a "Jun,"** and another person not charged herein.

12. On or about the early morning of October 14, 1996, [5] **HERIBERTO NIEVES-ALONZO, a/k/a "Jun,"** transported Jose Hernandez-Jimenez, a/k/a "Chelo," (deceased) to a hospital in Aguadilla, Puerto Rico, where Hernandez-Jimenez received treatment for a wound he suffered in connection with the murder of Edward Llaurador-Rodriguez.

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COUNT TWO

Title 18, U.S.C., Section 924(o)

**CONSPIRACY TO COMMIT FIREARMS MURDER
IN RELATION TO A DRUG TRAFFICKING OFFENSE**

Beginning on a date unknown, but no later than in or about July, 1996, to on or about July 15, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

1. **VICTOR MANUEL VALLE-LASSALLE,**
a/k/a "Manolo,"
3. **NICHOLAS PEÑA GONZALEZ,**
a/k/a "Nicky,"
4. **OMAR F. GENAO-SANCHEZ,**
a/k/a "Omi,"

the defendants herein, did knowingly, willfully, unlawfully, and intentionally combine, conspire, confederate and agree with each other to knowingly carry and use a firearm, to wit a pistol, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute controlled substances as charged in Count One of this indictment, in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, while aiding and abetting each other and with malice aforethought, did unlawfully kill Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo," by shooting him with a firearm willfully, deliberately, maliciously and with premeditation.

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OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

The defendants did commit, among others, in the District of Puerto Rico, the following overt acts in furtherance of the objects and aims of the conspiracy.

1. The overt acts listed in Count One of the instant indictment are realleged and incorporated herein by reference as if set forth fully herein and are further designated as overt acts in furtherance of the conspiracy charged in Count Two of the instant indictment.

2. Counts One and Three of the instant indictment are realleged and incorporated herein by reference as if set forth fully herein and are further designated as overt acts in furtherance of the conspiracy charged in Count Two of the instant indictment.

All in violation of Title 18, United States Code, Section 924(o).

COUNT THREE

Title 18, U.S.C., Section 924(j)

**FIREARMS MURDER IN RELATION
TO A DRUG TRAFFICKING OFFENSE**

On or about July 15, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

1. **VICTOR MANUEL VALLE-LASSALLE,**
a/k/a "Manolo,"
3. **NICHOLAS PEÑA GONZALEZ,**
a/k/a "Nicky,"
4. **OMAR F. GENAO-SANCHEZ,**
a/k/a "Omi,"

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the defendants herein, while aiding and abetting each other, did knowingly carry and use a firearm, to wit, a pistol, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute controlled substances as charged in Count One of this indictment (which Count is realleged and incorporated by reference herein), in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, while aiding and abetting each other and with malice aforethought, did unlawfully kill Carlos Roberto Rodriguez-Torres, a/k/a "Robert Caballo," by shooting him with a firearm willfully, deliberately, maliciously and with premeditation. All in violation of Title 18, United States Code, Section 924(j) and Title 18, United States Code, Section 2

COUNT FOUR

Title 18, U.S.C., Section 1512(a)

MURDER OF A WITNESS OR INFORMANT

On or about October 13, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

1. **VICTOR MANUEL VALLE-LASSALLE,**
a/k/a "Manolo,"
2. **JOSE RODRIGUEZ MARRERO,**
a/k/a "Zurdo,"
5. **HERIBERTO NIEVES ALONZO,**
a/k/a "Jun,"

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6. **HENRY PAMIAS-BURGOS,**
a/k/a "Moncho Orejas," and
7. **PATRICIO PEREZ-VEGA,**

the defendants herein, and Jose Hernandez-Jimenez, a/k/a "Chelo," (deceased) and another person not charged herein, while aiding and abetting each other, did kill Edward Llaurador-Rodriguez with intent to:

- (1) prevent the attendance or testimony of any person (Edward Llaurador) in an official proceeding and
- (2) prevent the communication by any person (Edward Llaurador) to a law enforcement officer relating to the commission or possible commission of a Federal offense,

and that the killing of Edward Llaurador-Rodriguez constitutes a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, **JOSE RODRIGUEZ MARRERO, a/k/a "Zurdo,"** with malice aforethought, did unlawfully kill Edward Llaurador-Rodriguez, by decapitating him with a machete, willfully, deliberately, maliciously and with premeditation. All in violation of Title 18, United States Code, Section 1512(a)(1) and (a)(2) and Title 18, United States Code, Section 2.

COUNT FIVE

Title 21, U.S.C., Section 848(e)(1)

MURDER WHILE ENGAGING
IN DRUG TRAFFICKING OFFENSE

On or about October 13, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

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1. **VICTOR MANUEL VALLE-LASSALLE,**
a/k/a "Manolo," and
2. **JOSE RODRIGUEZ MARRERO,**
a/k/a "Zurdo,"

the defendants herein, while aiding and abetting each other, while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A), to wit, conspiracy to possess with intent to distribute controlled substances, as alleged in Count One of this Indictment (which Count is realleged and incorporated by reference herein), intentionally killed and counseled, commanded, induced, procured, and caused the intentional killing of Edward Llaurador-Rodriguez, and such killing resulted. All in violation of Title 21, United States Code, Section 848(e)(1) and Title 18, United States Code, Section 2.

COUNT SIX

Title 18, U.S.C., Section 1512(b)(1)

TAMPERING WITH A WITNESS

In or about December of 1997 and January of 1998, in the District of Puerto Rico and within the jurisdiction of this Court,

1. **VICTOR MANUEL VALLE-LASSALLE,**
a/k/a "Manolo," and
10. **LUIS ANGEL LOPEZ-LORENZO,**
a/k/a "Millo,"

the defendants herein, while aiding and abetting each other, did knowingly and willfully attempt to corruptly persuade another person, with intent to influence, delay, or prevent the testimony of any

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person in an official proceeding. The offenses charged herein did occur in connection with a trial of a criminal case and the "official proceeding" described herein is an official proceeding before a judge or court of the United States. All in violation of Title 18, United States Code, Section 1512(b)(1) and Title 18, United States Code, Section 2.

GUILLERMO GIL
United States Attorney

Jorge E. Vega-Pacheco
Assistant U.S. Attorney
Chief, Criminal Division


W. Stephen Muldrow
Assistant U.S. Attorney

Date: July 15, 1998.